

UNITED STATES BANKRUPTCY COURT DISTRICT OF WYOMING

Debtor 1: MODE ELEVEN BANCORP
Name

Case #: 25-20240-CDP

Debtor 2: _____

Chapter: 11, Subchapter V

Local Bankruptcy Form 9013-1.1
Notice of Motion/Application

Part 1 Objection Deadline

FILED IN THE
US BANKRUPTCY COURT
DISTRICT OF WYOMING
JUN 30 2025 PM01:23
HJ ESTERHOLDT, CLERK

Objection Deadline: **July 25, 2025**

Part 2 Notice

NOTICE IS HEREBY GIVEN that Paul A. Jordan, Chapter 11, Subchapter V Trustee ("*Trustee*") of the bankruptcy estate of Mode Eleven Bancorp ("*Debtor*") has filed a Motion for Approval of Post-Petition Retainer for Subchapter V Trustee (the "*Motion*").

In connection with the Debtor's Chapter 11 filing and pursuant to 11 U.S.C. § 1183(a), on June 11, 2025, the United States Trustee appointed Trustee as Subchapter V trustee in the above-captioned case.

Trustee is requesting a post-petition retainer from Debtor in the amount of \$3,000 (the "*Retainer*") to be held in Trustee's trust account as a security towards anticipated fees and expenses incurred and to be incurred in performance of his duties as Subchapter V trustee in Debtor's bankruptcy case. If approved and upon receipt, Trustee will assert a first priority security interest in the Retainer. In the event the case is dismissed or converted to Chapter 7, Trustee's security interest in the retainer may enable Trustee to receive payment of his fees and expenses to the extent of the Retainer ahead of other allowed administrative claims.

Trustee shall make application to the Court pursuant to the rules and orders of this Court and the Federal Rules of Bankruptcy Procedures for payment of fees and expenses from the Retainer. Should the Retainer exceed the fees and expenses incurred by the Trustee, or the fees and expenses approved by the Court, the Trustee will refund the surplus amount to the Debtor.

If you oppose the Motion or object to the requested relief, your objection and request for hearing must be filed on or before the objection deadline stated above, served on the Movant at the address indicated below, and must state clearly all objections and any legal basis for the objection. The Court will not consider general objections.

In the absence of a timely, substantiated objection and request for hearing by an interested party, the Court may approve or grant the requested relief without any further notice to creditors or other interested parties.

Part 3 Signature of Movant's Attorney or Movant (if unrepresented)

Dated: June 26, 2025

/s/ Paul A. Jordan
Paul Jordan, Trustee
5 Tamarade Drive
Littleton, CO 80127
Tel: (303) 809-1273
Email: paul@np3llc.com

**UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF WYOMING**

In re:)	
)	
MODE ELEVEN BANCORP)	Case No. 25-20240 – CDP
)	Chapter 11, Subchapter V
)	
Debtor.)	

CERTIFICATE OF SERVICE

I certify that on June 26, 2025, I served a complete copy of **NOTICE OF MOTION TO APPROVE POST-PETITION RETAINER FOR SUBCHAPTER V TRUSTEE** on the following parties in the attached Creditor Address Mailing Matrix, which was obtained from the Court's docket on June 26, 2025 in accordance with 11 U.S.C. § 342(c) and Federal Rules of Bankruptcy Procedure except for the flowing who were served via CM/ECF:

via CM/ECF:

United States Trustee
Daniel J. Morse, Esq.
Lacey Bryan, Esq.
Bradley Hunsicker, Esq.
Abigail V. O'Brient, E

Dated: June 26, 2025

/s/ Paul A. Jordan
Paul A. Jordan, Trustee
5 Tamarade Drive
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Tel: (303) 809-1273
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al Matrix for local noticing
1089-2
Case 25-20240
District of Wyoming
Cheyenne
Thu Jun 26 12:55:59 MDT 2025

Mode Eleven Bancorp
133 Main Street
Hulett, WY 82720

US Bankruptcy Court
2120 Capitol Avenue #6004
Cheyenne, WY 82001-3647

Aaron Hower
15423 Sunset Lane
Mt. Vernon, WA 98273-8840

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Kypranoros 13, 1061 Nicosia Cyprus

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Norwalk, CT 06853-1413

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Collections Bureau/Bankruptcy Unit
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Boston, MA 02204-7090

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Henderson, NV 89074-5333

(p)MONTANA DEPARTMENT OF REVENUE
ATTN BANKRUPTCY UNIT
PO BOX 7701
HELENA MT 59604-7701

Myles Stafford
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Bismarck, ND 58503-6944

(p)STATE OF NEW JERSEY DIVISION OF TAXATION
ATTN BANKRUPTCY UNIT
PO BOX 245
TRENTON NJ 08695-0245

NYS Dept of Taxation and Finance
Bankruptcy Section
PO Box 5300
Albany NY 12205-0300

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Carson City, NV 89706-7939

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Camana Bay, Grand Cayman
KY1 9009
Cayman Islands

Nison Aronov
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Special Supervision Division
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CAYMAN ISLANDS

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(p)WA STATE DEPT OF LABOR & INDUSTRIES
BANKRUPTCY UNIT
PO BOX 44171
OLYMPIA WA 98504-4171

Wyoming Department of Revenue
122 W 25th St
Cheyenne, WY 82001-3004

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Littleton, CO 80127-3517

The preferred mailing address (p) above has been substituted for the following entity/entities as so specified by said entity/entities in a Notice of Address filed pursuant to 11 U.S.C. 342(f) and Fed.R.Bank.P. 2002 (g)(4).

Montana Department of Revenue
ATTN Bankruptcy
PO Box 7701
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NJ Division of Taxation
3 John Fitch Way, 5th Floor
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Tumwater, WA 98501

End of Label Matrix
Mailable recipients 116
Bypassed recipients 0
Total 116